
United States District Court

Western

DISTRICT OF

Missouri

UNITED STATES OF AMERICA	18 U.S.C. § 371	18 U.S.C. §§ 2113(a) and (d)
v.	[NMT: 5 Years Imprisonment;	[NMT: 25 Years Imprisonment;
	NMT: \$250,000 Fine;	NMT: \$250,000 Fine;
	NMT: 3 Years Supervised Release	NMT: 5 Years Supervised Release
WILLIAM ALAN WOLFE	\$100 Mandatory Special Assessment	\$100 Mandatory Special Assessment
[DOB: 04/061981]	Class D Felony	Class B Felony

CRIMINAL COMPLAINT

Case Number: 09-00095REL-01

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE

Between on or about July 2, 2009 and on or about July 9, 2009, in the Western District of Missouri, and elsewhere, the defendant, William Alan Wolfe, did knowingly and intentionally combine, conspire, and agree with another individual to commit offenses against the United States that is, by force, violence, and intimidation, to take and cause to be taken from the person and presence of bank tellers, a thing of value, to wit money belonging to and in the care, custody, and control of financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in furtherance of the conspiracy, and to effect and accomplish the objectives thereof, one or more of the conspirators committed one or more overt acts, which are the bank robberies set forth in the affidavit.

All in violation of Title 18, United States Code, Sections 371 and 2113(a) and (d).

COUNT TWO

On or about July 2, 2009, in Winigan, Missouri, Sullivan County, in the Western District of Missouri, the defendant, William Alan Wolfe, by force, intimidation and violence, did knowingly take and cause to be taken from the person and presence of Cheryl Crist, bank employee, a thing of value, to wit, approximately

\$25,561 in money belonging to and in the care, custody, control, management and possession of Bank of Brookfield Purden, 33332 Main, Winigan, Missouri, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC), and in committing and causing to be committed the foregoing offense, the defendant assaulted and put in jeopardy, the life of bank employee Cheryl Crist and others, use of a dangerous weapon, that is, a handgun.

All in violation of Title 18, United States Code, Sections 2113(a) and (d).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts: (See attached Affidavit)

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.

BENJAMIN KINSEY
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 9, 2009
Date

at Kansas City, Missouri
City and State

HONORABLE ROBERT E. LARSEN
United States Magistrate t Judge
Name and Title of Judicial Officer

Signature of Judicial Officer